

# Exhibit B

In The Matter Of:

***Giordano vs. C.R. Bard***

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***Suzanne Parisian, M.D.***

September 25, 2014

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1 But you can use it to look for trends in your own  
2 device compared to other people. But in terms of a  
3 labeling, it would tend to be something a little bit  
4 more robust.

5 Q In other words, you may see trends or may  
6 evaluate it trying to perceive trends, but you would  
7 not put the comparison based only on the MAUDE database  
8 into your labeling, would you?

9 A No. You could use medical literature because  
10 there are studies where people actually have done  
11 retrospective studies, and you could cite the author  
12 and let the people go look at that. But the MAUDE  
13 database, it can be used for certain things, but it's  
14 not -- you wouldn't use it across industry to come up  
15 with the incidence rate. And it says it on the  
16 database; don't use it as an incidence rate, but you  
17 can come up with -- you can use it for certain things,  
18 but I wouldn't use it for that.

19 Q I believe that we talked about this earlier,  
20 but I'm not sure it was clear. The pain that Ms. Keith  
21 complained of, the acute pain, you're not able to give  
22 a medical opinion that that pain was associated with  
23 the filter itself, are you?

24 A I'm not caring for Ms. Keith. I think the  
25 internal, the internist would probably be the one to